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November 1, 1995

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket No. 95-155: In the Matter of Toll Free Service
Access Codes, Notice of Proposed Rulemaking, FCC 95-
419; Adopted: October 4, 1995; Released: October 5, 1995.

Dear Mr. Caton:

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Enclosed herewith please find an original and nine (9) copies of the
comments of the SMS/800 Number Administration Committee
("SNAC"), an industry committee of the Ordering and Billing
Forum under the auspices of the Alliance for Telecommunications
Industry Solutions, Inc. - sponsored Carrier Liaison Committee, to
be filed in the above-referenced proceeding.

If you have any questions, please call me at (202) 434-8828.

Sincerely,

Susan M. Miller

Vice President and General Counsel

cc: International Transcription Service, Inc. ("ITS")

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

DOCKET FILE COPY ORIGINAL

In the Matter of)
) **CC Docket No. 95-155**
Toll Free Service Access Codes)
)

**COMMENTS OF THE
SERVICE MANAGEMENT SYSTEM/800
NUMBER ADMINISTRATION COMMITTEE
OF THE
ORDERING AND BILLING FORUM**

**Susan M. Miller
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November 1, 1995

In the Matter of)
) **CC Docket No. 95-155**
Toll Free Service Access Codes)
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SUMMARY

The SMS/800 Number Administration Committee ("SNAC"), an industry committee under the auspices of the Alliance for Telecommunications Industry Solutions, Inc. - sponsored Carrier Liaison Committee files these comments in response to the FCC's Notice of Proposed Rulemaking ("NPRM"), In the Matter of Toll Free Service Access Codes, CC Docket No. 95-155. These comments respond to four specific areas in the NPRM: (1) lag time; (2) a plan for the rollout and implementation of the new toll free service access codes ("SACs"); (3) the suggestion of a permanent cap on reserved numbers as a means to reduce and/or eliminate warehousing of toll free numbers; and (4) data which addresses the interest by current 800 number holders in seeking corresponding 888 numbers.

The SNAC considered reducing the amount of time which a toll free number can remain in reserved status from 60 days to 45 days or 30 days. SNAC rejected this option during conservation and reaffirms its view now. The 30 day reserved status does not give adequate time to install the necessary equipment, which are primarily T1 facilities, for provision of service to the customer. Customers indicated that the shorter time frames were too tight to develop marketing plans and prepare to offer the toll free number. SNAC notes that even if the reserved status were shortened, it would still be possible to re-reserve a number for multiple periods of time. To eliminate the "re-reserve" function would require a significant and costly enhancement to the SMS/800.

SNAC also disagrees with reducing the time that a number can remain in the "assigned" status from 12 to 4 months. The longer assigned status is for customers whose numbers are embedded in their business plan, yet are not required for usage until some later date, such as the number dedicated to the 1996 Olympics. These customers must have a number assigned in advance for planning and promotional purposes. Further, the total numbers in

assigned status have been less than one tenth of one percent of 7.9 million working numbers, and thus would not reap a large return of numbers. SNAC also disagrees that the aging process is longer than necessary. SNAC chose to use aging time frames as low as 4 months up to the SMS limit of 12 months during conservation. Yet the measure was not mandated permanently because it was likely to produce significant problems while not producing a significant return of numbers. SNAC also notes that the FCC's proposal to shorten the suspend status could adversely effect customers' business plans and also would not produce a significant return of numbers.

SNAC has developed a plan for the implementation of 888 which addresses exhaust and which could serve as a starting point for the roll-out of future SACs. The plan addresses: (1) customers' desires to replicate their existing 800 number in 888; (2) the roll out of 888 in such a way to meet pent up demand and new service requirements; and (3) protect the SMS/800 system's hardware and process from overload. Fundamental to this plan is the process defined by SNAC which would allow RespOrgs to contact their customers to designate those numbers which they want replicated in the 888 resource. Also a crucial element of the plan is the ability to phase in the new toll free SAC while providing a mechanism for early 888 reservations and continuing to make available the 800 SAC. In order to effect this transition and lessen system impacts, there needs to be a temporary change to the current FCC-mandated allocation plan for 800 numbers as detailed in these comments. SNAC submits that without this change, there will be little opportunity for early reservation of 888 numbers.

SNAC supports lowering the current cap of 15 percent for reserved numbers to 8 percent during conservation. It continues to evaluate whether the 8 percent or some percent lower than 15 is workable as an ongoing matter.

A SNAC survey of RespOrgs revealed that 24 percent or 1,142,247 numbers out of 4,745,514 were identified as vanity numbers. A number of other questions were asked and the data is contained herein.

In the Matter of)
) **CC Docket No. 95-155**
Toll Free Service Access Codes)
)

The Ordering and Billing Forum's ("OBF"), Service Management System 800 ("SMS/800") Number Administration Committee ("SNAC"), an industry committee under the auspices of the Alliance for Telecommunications Industry Solutions, Inc. ("ATIS") - sponsored Carrier Liaison Committee ("CLC") hereby files these comments with the Federal Communications Commission (the "FCC" or the "Commission") in response to the FCC's Notice of Proposed Rulemaking ("NPRM"), In the Matter of Toll Free Service Access Codes, CC Docket No. 95-155, FCC No. 95-419, adopted October 4, 1995 and released October 5, 1995. ¹ These comments respond to

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the FCC's proposals to: "(1) promote the efficient use of toll free numbers; (2) foster the fair and equitable reservation and distribution of toll free numbers; (3) smooth the transition period preceding the introduction of a new toll free code; (4) guard against warehousing of toll free numbers; and (5) determine how toll free vanity numbers should be treated." ² The SNAC will address four specific areas raised by the FCC's NPRM. They are: (1) those FCC concerns and proposals which address lag time; ³ (2) a proposed plan for the rollout and implementation of the new toll free service access codes ("SAC"); (3) the FCC suggestion of a permanent cap on reserved numbers as a means to reduce and/or eliminate warehousing of toll free numbers; ⁴ and (4) the provision of data which addresses the interest by current 800 number holders in seeking corresponding 888 numbers in response to the FCC's request for such information. ⁵

² NPRM, at ¶ 2.

³ *Id.*, at ¶s 17-19.

⁴ *Id.*, at ¶s 33-34.

⁵ *Id.*, at ¶s 35-43.

I. OVERVIEW OF THE OBF'S SNAC AND ITS PROCESSES

Established in 1985, the OBF provides a forum for customers and providers in the communications industry to identify, discuss and resolve national issues which affect ordering, billing, provisioning and exchange of information about access service and related industry matters. The OBF consists of six committees. They are: 1) the Access Service Request ("ASR") Committee, 2) the Billing Committee, 3) the Message Processing Committee, 4) the Ordering and Provisioning ("O&P") Committee, 5) the Subscription Committee and 6) the SNAC.

The SNAC has as its mission to identify, develop and implement the resolution of issues focused on the support of the SMS/800. Specifically, its responsibilities include SMS/800 process enhancements, customer and provider responsible organization ("RespOrg") requirements, technical/operational issues, SMS documentation requirements, and Number Administration Service Center ("NASC")/RespOrg support processes. In addition, the SNAC is responsible for maintaining certain documentation to support the database administration processes as defined in the "Industry Guidelines for 800 Number Administration " which outline: RespOrg Responsibilities, 10-Digit 800 Number Administration, Coordinated Conversion of 800 Database Services, and NASC Responsibilities Support Processes.

Resolution of issues in the SNAC, as well as the other OBF committees, is by consensus which is established when substantial agreement (i.e. more than a simple majority, but not necessarily unanimity) has been reached among the interest groups participating in the issue at

hand.⁶ The SNAC issue resolution process (called the "going-going-gone" process) gives the industry an opportunity to review the committee's resolution first in "initial closure" before the issue resolution is considered final and placed in "final closure." Initial closure is the first phase in closing an issue. It gives official notification to the industry, via publication in the OBF meeting record, that the SNAC has completed its work and reached an initial resolution of the issue. If any interested party has any concerns with the proposed resolution of an issue in "initial closure," they are encouraged to submit contributions to the SNAC for further consideration. Until consensus is reached on any proposed changes, the issue shall be "held in initial closure."

Once a SNAC issue has been accepted for initial closure at an OBF General Session, the issue is generally submitted for "final closure" at the next General Session.⁷ "Final closure" is the last phase in closing an issue. Final closure serves as official notification to the industry that consensus has been reached for resolution of an issue. During the SNAC meetings, preceding the General Session, the committee leaders identify the issues recommended for final closure. If no new information surfaces, the issues recommended for final closure are included in the committee report, and reported at the OBF General Session as being final.

When consensus is achieved, customers and providers are committed to consider the OBF resolutions in good faith and to consider implementation on a timely basis. However, resolution

⁶ "Interest groups" are those materially affected by the outcome of the result. In the OBF, these interest groups are generally customers and providers. However, the OBF's activities are open to anyone interested in its activities.

⁷ The OBF conducts a "general session" which is the culmination of the six committees' activities. The OBF participants come together in general session to review the week of committee activities and to reach consensus on each committee's recommendations regarding issues. OBF General Sessions and committee meetings are held on a quarterly basis with interim committee meetings scheduled on an as needed basis.

implementation is voluntary and neither the SNAC nor the OBF controls how services are offered.

II. HISTORY OF THE SNAC AND BACKGROUND ON ITS INVOLVEMENT IN ISSUES ON TOLL FREE NUMBERS

The SNAC has been in existence since February, 1995. The first industry efforts to address issues involving the provision of 800 database service were organized in 1987. The effort was called the Ad Hoc 800 Database Committee, and it also operated under the auspices of the OBF. Its mission was to address technical/operational issues related to the implementation of 800 database service, and one of its first undertakings was to develop the "Industry Guidelines for 800 Number Administration" ("Guidelines") which are still in use today. They are currently maintained by the industry via the SNAC consensus resolution processes.

In 1990, the CLC in its oversight responsibility for the OBF and its subtending committees, acted upon an industry recommendation that the Ad Hoc 800 Database Committee ("Ad Hoc Committee") would be better aligned to report to the CLC directly. That repositioning occurred and the Ad Hoc Committee continued its work but reporting to the CLC.

After several years of operation, the activities of the Ad Hoc began to level off, except for those technical/operational issues related to the enhancements of the SMS/800. Through a technical subcommittee of the Ad Hoc, the industry reached consensus on the SMS/800 enhancements and the priority for which the industry was seeking implementation of these enhancements. As a result, the CLC recommended that the technical/operational aspect of the work which was part of the Ad Hoc Committee's responsibility needed a place to continue and the Ad Hoc could sunset.

In February, 1995, the SNAC was organized, again under the auspices of the OBF, and it would continue the work on those issues related to enhancements to the SMS/800 transferred from the former Ad Hoc Committee. At this same meeting, the SNAC also was presented with issues related to the need for interim exhaust relief measures for 800 numbers, 800 number assignment rate reports, the need for changes to the 800 Number Administration Guidelines to reflect any conservation methods agreed to by the industry and a transitional number report.⁸ These issues were first presented at the SNAC inaugural meeting in February, 1995 by the Industry Numbering Committee("INC"), also an ATIS-sponsored committee working under the umbrella of the CLC's Industry Carriers Compatibility Forum ("ICCF").⁹ INC had determined that additional numbering resources would be needed to meet the projected exhaust date of late 1995 or early 1996 for 800 numbers as well as future demands for toll free numbers. On January 25, 1995, INC designated "888" as the new code, with the use of 877, 866, 855, 844, 833, and 822, to follow use of 888. To fully understand the issues presented by the impending exhaust, the INC and the newly organized SNAC met in early March, 1995 to begin discussions to resolve the issues raised by exhaust and the need for conservation of the existing 800 resource.

To date, the SNAC has addressed 7 issues pertaining directly to the conservation of the existing 800 number resource and expansion of the new toll free resource to 888 as well as a plan to have the 888 service ready for customer use on March 1, 1996, just one year after SNAC

⁸ These issues are OBF Issue Numbers 1100/SMS, 1101/SMS, 1102/SMS, and 1107/SMS respectively.

⁹ The issues before the INC were brought to the INC by the North American Numbering Plan Administrator ("NANPA"), after it realized that the national database of numbers was being depleted. INC had been asked to consider the rapid depletion and what appropriate actions should be taken to address the situation.

began its operations. Six of these issues have been resolved.¹⁰

III. SNAC EFFORTS TO PROVIDE EFFICIENT USE OF TOLL FREE RESOURCES

Ever since the SNAC was first presented with the issue of depletion of 800 numbers, it has sought to promote the efficient use of existing toll free numbers consistent with the Commission's stated goal in this proceeding.¹¹ SNAC's efforts are driven by its participants who are largely RespOrgs and service providers, the very entities who have a responsibility to ensure that toll free numbers are available for their subscribers when they need and want them.¹² In its effort to develop a conservation plan for 800 numbers, the SNAC, as one of its first matters, addressed those provisions within the Industry Guidelines for 800 Number Administration for which interim exhaust relief measures were needed, such as reservation limits and the aging status definition, as well as other conservation measures. Specifically, the SNAC considered one of the very options that the Commission has proposed, that is, reducing the amount of time which a toll free number can remain in reserved status from sixty (60) days to forty-five (45) or thirty (30) days.¹³ However, the SNAC's consideration of this approach was in the context of a conservation mode only and it contemplated that upon availability of the new toll free numbers, the reserved status

¹⁰ These issues include: 1100 - Interim Exhaust Relief Measure For 800 Numbers (with INC); 1101 - 800 Number Assignment Rate Reports (with INC); 1102 - 800 Number Administration Guidelines Changes; 1107 - Transitional Number Report; 1117 - SMS/800 Impacts- Interim 888 NXX; and 1152 - Timely Reservation of New 888 Numbers.

¹¹ NPRM, at ¶ 12.

¹² SNAC has, on average, fifty (50) regular active participants, representing twenty-five (25) companies. However, its documents and consensus resolutions are distributed to over three hundred (300) parties, including all the RespOrgs. The SNAC participants represent a broad cross-section of the industry serving ninety percent (90%) of 800 end user subscribers.

¹³ NPRM, at ¶ 18.

category would return to its full sixty (60) day reservation window.

Lengthy discussions on the reduction of the reserved status from sixty (60) to forty-five (45) days occurred, and consensus was reached by SNAC that the reserved status should remain at sixty (60) days even in light of the need for interim exhaust relief from the depletion of 800 numbers.¹⁴

A number of rationales were advanced by SNAC participants for their decision not to shorten the time frame for which numbers could be kept in the reserved status. Some participants stated that thirty (30) days in reserved status does not give adequate time to install the necessary equipment, which are primarily T1 facilities, for provision of service to the customer. It was also noted that a reserved status of thirty (30) or forty-five (45) days simply does not meet customer needs. Customers indicated that the shorter time frames were too tight for them to develop marketing plans and prepare generally for readiness to offer the toll free number. Further, SNAC noted that even if the length of time that a number could be held in reserved status were shortened, it would still be possible within the SMS/800 architecture to re-reserve a number for multiple periods of time, and thus the desired result of eliminating a lag time would not really be achieved. It was also noted that to change the SMS architecture to eliminate the function which allows a number to be re-reserved a number of times by the same customer would require significant and costly enhancements to the SMS/800.

SNAC discussed these rationales when the industry was under significant pressure to develop needed conservation measures for 800 numbers. Yet in its consideration of the FCC's proposal,

¹⁴ See April 25-27, 1995 Joint SNAC/INC Meeting Minutes, Discussion of Issue 1100/SMS, pp 2-20.

SNAC reaffirms these rationales now. SNAC submits that whether it be a matter of needing to conserve numbers or whether it is simply a change in the Guidelines to shorten the reserved window in an attempt to free up numbers for a more rapid turnover, the current decision to support and maintain the length of time set at sixty (60) days for a number in reserved status is both well-substantiated and necessary. The above-discussed rationales and considerations outweigh any advantages that would seem to flow from shortening the reserved status window. As such, SNAC submits that there should be no change in the reservation window, and based on its experience, the Commission's proposal would overturn a carefully considered time frame and a sound process which serves both service providers' and customers' needs.

SNAC also disagrees with the Commission's proposal to reduce the amount of time from twelve (12) months to 4 months for which a toll free number can be in the "assigned "status, but not actually working.¹⁵ This time frame, too, was designed with certain customer needs in mind and was given careful consideration when the Guidelines were first developed.

SNAC submits that the ability of a RespOrg to place a number in the assigned status for as much as twelve (12) months is to address the needs those customers whose numbers are embedded in their business plan, yet are not required for usage until some later date. An example is the use of a number dedicated to the 1996 Olympics. In this situation, the customer must have a number assigned well in advance for planning, advertising and promotional media purposes, warranting the need for the number to be placed in the assigned status for longer than the FCC's proposed four months. As such, the SNAC submits that changing the ability of a RespOrg and its customer to keep their number in an assigned status for any time frame less than twelve (12)

¹⁵ NPRM, at ¶ 18.

months could seriously impede the ability of customers to conduct their business as well as the ability of RespOrgs to meet their customers needs. Moreover, the FCC's proposal is not likely to reap as large a return of toll free numbers as the FCC would hope, particularly since the assigned status was designed to address the relatively narrow circumstances discussed above.¹⁶ Thus, SNAC believes that the drawbacks of implementing this proposal may far outweigh the benefit of a small amount of numbers becoming available more quickly.

Finally, SNAC also challenges the FCC's view that there is a longer aging process defined in the Guidelines than is necessary or reasonable. Section 2.2.6 of the Guidelines provides that when the 800 service is disconnected or canceled, the 800 number must be recovered, returned to the SMS/800 assignment pool and made available for reassignment to other potential 800 service end-user subscribers. Prior to FCC mandated allocations, the existing time frame in which this occurred was 6 months and was a systematic minimum. However, when the SNAC looked at the Guidelines to implement conservation measures, it reached consensus that RespOrgs may voluntarily choose to use time frames as low as 4 months up to the system limitation of twelve (12) months as customer and business requirements dictate.¹⁷ The SNAC recognized that a 4 month return time frame is both possible and feasible in the SMS/800, and thus, allowing the voluntary return of a number in 4 months may facilitate limited conservation of 800 numbers. However, the SNAC did not mandate this measure permanently because the real effect of such a

¹⁶ Prior to the FCC's implementing the conservation allocation limits, a snapshot of SMS/800 number administration tracking reports showed that the total numbers in assigned status have been less than one tenth of one percent of 7.9 million working numbers. This percentage includes those numbers assigned for as little as one day to the twelve (12) month maximum.

¹⁷ April 25-27 1995 Joint SNAC/INC Meeting Minutes, at p.20.

measure would be likely to produce significant problems and not produce a significant return of numbers to the SMS/800. For these reasons, SNAC still supports the systematic minimum of six (6) months.

Again, the SNAC would emphasize that customers' needs drive this approach. Some customers may have specified recordings or intercept announcements for the disconnected number. Others have placed their numbers in directory listings, which are published less frequently than 4 months. As a result, SNAC was concerned that setting the time frame between disconnect or cancellation of a toll free number and the time at which the number is available for reassignment at 4 months raises such problems as subjecting customers to wrong number errors in directories and wrong number billings.

SNAC also notes that the FCC's proposal to shorten the suspend status could adversely effect customers' business plans and would not produce a significant return of numbers to the SMS.¹⁸ The twelve (12) month systematic maximum suspend status responds to those customers who may have seasonal businesses, such as ski resorts, which operate only 6 months of each year. In these examples, the customers have significant investments in their numbers and have established an identity with their number, yet they do not have a year-round need for their assigned number. Thus, SNAC does not support any change to the length of time for the suspend status because it would not produce a significant return of numbers to the SMS/800 and could result in significant impacts to customers' business processes.

In each case, the SNAC has considered the very proposals suggested by the Commission which would at first blush, appear to promote a more efficient use of toll free numbers and ensure

¹⁸ There are less than 1,000 numbers currently in the suspend status.

assignment in a fair and orderly manner. However, as discussed herein, SNAC has found, on balance, that the efficiencies and the conservation sought are not really achieved. Moreover, the needs of customers appear to drive different conclusions. Thus, based on its experience and its discussions, SNAC does not support the FCC's proposals to address what it perceives as "lag time." SNAC has concluded that the statuses as defined in the Guidelines and the corresponding time frames incorporated therein were carefully considered, are well supported, and thus, should be maintained.

IV. SNAC PROPOSED PLAN FOR 888 NETWORK IMPLEMENTATION

The FCC stated that one of its specific goals in this proceeding is "to avoid rapid, unanticipated depletion of [sic] scarce numbering resources" again in the future.¹⁹ The Commission noted the importance of having policies and procedures in place to prevent the reoccurrence of toll free resource exhaust in advance of the deployment of new toll free codes, including the measures which should be adopted to effect a gradual implementation of the new toll free service access code - 888.

SNAC has developed a plan for the implementation of 888 which it believes meets these goals and provides for an orderly transition to the availability of the next SAC while minimizing SMS/800 and customer impacts.²⁰ Importantly, while SNAC acknowledges that its plan was

¹⁹ NPRM, at ¶ 22.

²⁰ See Attachment A for the "SNAC 888 Network Implementation Plan." At its meeting held October 23-26, 1995, the SNAC placed its plan into initial closure, the first phase in closing an issue. Initial closure gives official notification to the industry, via publication in the OBF meeting record, that the SNAC has completed its work and reached an initial resolution of the issue. SNAC expects the implementation plan to go into final closure at its January 8-11, 1996 meeting.

crafted to address the time crunch presented by impending exhaust, SNAC also believes that this plan could serve as a starting point and perhaps, even a model for the roll-out of future SACs. The plan outlines the major activities that need to take place to meet the March 1, 1996 888 service availability date when the vast majority of customers can expect to have service from a majority of North American locations.

With the opening of the new toll free SAC code, an additional 7.9 million toll free numbers will become available. And an additional 7.9 million numbers will become available for each toll free SAC opened thereafter. However, due to the unique circumstances and the complications presented by the opening of the first toll free SAC when coupled with the expected rush to meet pent up customer expectations, as well as the system impacts presented by this new undertaking, SNAC felt there was a strong need to develop such a plan.

The SNAC submits that the objectives of its plan are: (1) to address the issues raised by some customers' desires to replicate their existing 800 number in the 888 resource; (2) to roll out 888 in such a way to meet pent up demand as well as the new service requirements of customers; and (3) to protect the SMS/800 system's hardware and process from overload. The plan involves an industry-wide coordinated effort by the SMS/800 and its supporting resources, the SNAC, Bellcore, the local exchange community, the service control point ("SCP") owner operators, the Network Operations Forum, and the RespOrgs. Each are charged with specific tasks which are defined and explained by the plan in great detail. Each task has a scheduled start and scheduled finish date as well as a projected duration. Each step of this plan is carefully orchestrated to move the industry toward the goal of service being ready for customers on March 1, 1996.

Fundamental to making the SNAC plan work was the ability of the industry to devise a way to

address some customers' desire for replicating vanity numbers, as they are defined by the Commission, while knowing that whether replication or "branding" would be permitted as a matter of policy was an issue that would likely be pending before the Commission while this plan was being developed and implemented. The SNAC was able to reach consensus on a "work around" which would address this dilemma. The SNAC defined a process which would allow RespOrgs to contact their customers to designate those numbers which they may want replicated in the 888 resource. Upon doing so, these numbers would be marked "unavailable" in the SMS/800 database before the reservation process for 888 begins. SNAC felt that eliminating these numbers from the reservation process and the initial processing of 888 data through the SMS/800 and the SCP processes would help to lessen the possibility of overloading the SMS/800 and SCP processes during 888 rollout. And because the identification of these numbers which customers want "marked" in the 888 resource is scheduled for completion by the RespOrgs to send to DSMI by mid-December, this data may be useful in gauging the percentage of those 888 numbers which will be immediately used if replication is decided to be in the public interest, and thus implemented.

Also a crucial element of the SNAC plan is the ability to phase in the new toll free SAC , providing some mechanism whereby early reservations for 888 could be accommodated while continuing to make available the 800 SAC. The SNAC maintains that in order to effectuate this transition and lessen the serious system impacts and overloads that would occur if no early reservation process were to exist, there needs to be some temporary and limited changes to the current FCC-mandated allocation plan for 800 numbers. SNAC's plan recommends that there be an 800 number allocation change for Week 1 to address pent up demand and another allocation

change for Weeks 2-6 of its proposed 888 implementation plan. SNAC intends to open 888 for early reservations on January 24, 1996. In Week 1(January 14-21, 1996), SNAC would propose that the current total allocation of 29,000 800 numbers be doubled. During Weeks 2-6 (January 21-February 25, 1996), the current allocation is proposed to be tripled for the combination of 800 and 888 reservations. There would, however, be the stipulation that one-third (29,000) of the allocation would be utilized for 800 reservations and two thirds (58,000) would be used for early 888 reservations. A new capability is proposed to be implemented in SMS/800 which will allow automatic tracking of the SNAC proposed allocation plan and will ensure system control allotment by NPA.

While SNAC recognizes that the successful implementation of its plan hinges largely on the FCC's willingness to accept SNAC's allocation formula, the SNAC submits that without this allocation charge there will be little opportunity for early reservation of 888 numbers. If the arrival of March 1, 1996 were to be the first opportunity for a customer to reserve 888 numbers, the system impacts could be significant, perhaps even disastrous to both 800 and 888 services nationwide. For example, the provisioning of emergency 800 service (e.g., service for natural disasters) would be impossible because of a system backlog. Any repair or maintenance needs requiring access to the SMS/800 system during this time could be significantly delayed or even result in an extended out-of-service period. Thus, the SNAC plan reflects the industry's best efforts to devise an orderly transition to the provision of 888 and now has the consensus support of the SNAC participants who represent a significant percentage of the industry. The SNAC believes the Commission should recognize and support this plan, too, as a viable approach to the introduction of the 888 SAC, the continued provision of 800 numbers, and possibly a model and

framework for the introduction of future toll free resources.

V. SNAC VIEW ON THE PROPOSED CAP FOR RESERVED NUMBERS

The Commission is seeking comment on whether a permanent cap on reserved numbers of 3 percent or some other number less than fifteen (15) percent should be imposed in an effort to prevent a large pool of toll free numbers remaining in reserve status (*i.e.*, being warehoused).²¹ The SNAC reached consensus that lowering the current cap of fifteen (15) percent and/or 1,000 numbers, whichever is greater, to 8 percent and/or 1,000 numbers, whichever is greater, of an entity's total working quantity of 800 service numbers during a period of conservation was appropriate and limits its view to periods of conservation only. The SNAC continues, however, to evaluate whether the 8 percent is workable in light of the fact that such a cap and certainly, one lower than proposed by SNAC, could significantly interfere with a company's ability to do business with customers seeking toll free numbers.²²

VI. SNAC DATA ON VANITY NUMBERS

On June 7, 1995, the ATIS-sponsored CLC, the parent committee of the OBF and the SNAC, discussed the issue of granting an exception to the "first-come first-served" assignment practice for duplicate 800/888 toll free NPAs which would allow subscribers to protect their existing 800 numbers in the new toll free 888 resource, before the resource is made generally available. During those discussions, the FCC had indicated that the issue of replication of 800 numbers in the 888 resource had not been quantified. There had been no presentation of data to know

²¹ NPRM, at ¶ 33.

²² SNAC accepted Issue 1203: Toll Free Number Administration Guideline Update at its meeting on October 23-26, 1995 to address the fifteen (15) percent cap.

whether the concern raised by the possibility of 888 replication represented a large or small problem.

In an effort to try and determine how many 800 number holders might want corresponding 888 numbers, the SNAC sent a survey to all existing RespOrgs which had access to the SMS/800 database in July , 1995.²³ The survey questions were developed by the SNAC and the data was collected by DSMI as a neutral third party. In addition, DSMI agreed to aggregate the data and provide it to SNAC in an effort to avoid the release of any sensitive information.

SNAC asked a series of questions in an attempt to quantify the number of customers who might want to replicate their 800 number in the new 888 toll free number. The questions first asked the total number of 800 numbers that each RespOrg provided services to. Then the RespOrgs were asked to identify how many total working 800 numbers are considered vanity numbers by their customers. The SNAC survey revealed that 1,142,247 numbers out of a total of 4,745,514 numbers or twenty-four (24) percent were identified as vanity numbers. RespOrgs were also asked to identify from those customers who considered their numbers vanity numbers, how many would want that same number replicated in 888. Again, the data shows that twenty-four (24) percent would seek replication of their 800 number. A number of other questions were posed including asking customers to indicate their reasons for replication, whether they be marketing concerns, wrong number billing concerns, or concerns over consumer education regarding toll free NPAs.

²³ SNAC has become aware that in some instances, customers are really seeking to protect their current 800 number, and not necessarily replicate their number in the 888 resource. A complete copy of the survey and the aggregated results are contained in Attachment B.

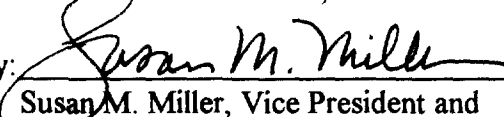
VII.

CONCLUSION

The SNAC respectfully submits these comments in response to the FCC's NPRM as the industry's best efforts to address a complex set of issues with regard to lag time, a rollout plan for 888 implementation, a permanent cap on reserved numbers, and data to support the interest by current 800 number holders to seek corresponding 888 numbers. Further, the SNAC encourages the FCC to act as quickly as possible with respect to the issues in the NPRM as the outcome of this proceeding is critical to the successful implementation of the next toll free resource - 888.

Respectfully submitted,
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